

U.S. Department of Education

**Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues**

RECOMMENDATION PAGE

1. **Agency:** Montessori Accreditation Council For Teacher Education (1995/2003)

(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)

2. **Action Item:** Compliance Report

3. **Current Scope of Recognition:** The accreditation of Montessori teacher education institutions and programs throughout the United States, including those offered via distance education.

4. **Requested Scope of Recognition:** Same as above.

5. **Date of Advisory Committee Meeting:** December, 2012

6. **Staff Recommendation:** Grant the agency an extension for good cause and continue its current recognition for a period of 6 months. Require the agency to submit a compliance report 30 days thereafter that demonstrates the agency's compliance with the issue identified below.

7. **Issues or Problems:** It does not appear that the agency meets the following sections of the Secretary's Criteria for Recognition. These issues are summarized below and discussed in detail under the Summary of Findings section.

-- the agency needs to finish and implement its revised requirements for the consistent evaluation of an entity's distance education with regard to the ten areas specified by the Secretary's criteria found in §602.16(a)(1), as appropriate. As well, the agency needs to document how its decision-makers are trained to consistently evaluate the effectiveness of an entity with a significant distance education

component. [§602.16(b)(c)]

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Montessori Accreditation Council for Teacher Education (MACTE) is a national programmatic and institutional accreditor. The agency currently accredits approximately 80 independent freestanding institutions, and 13 programs embedded within colleges, that are located throughout the United States.

The agency's recognition enables its institutions to establish eligibility to receive Federal student assistance funding under Title IV of the Higher Education Act of 1965, as amended (Title IV). MACTE serves as the Title IV gatekeeper for three of the institutions it accredits.

Recognition History

The Secretary of Education first recognized MACTE in 1995. Since that time, the Secretary periodically reviewed the agency and granted continued recognition. MACTE requested in July 2009, in accordance with the requirements of the Higher Education Opportunity Act, that distance education be added to its scope of recognition. In its August 2009 response, the Department notified MACTE that its request had been granted.

The last full review of the agency took place at the December 2010 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). After that review, the Secretary extended the agency's last grant of recognition and required a compliance report on the two issues cited in the staff analysis.

As part of its evaluation of the agency's compliance report, Department staff reviewed the agency's narrative and supporting documentation. As well, the Department received no third-party comments in connection with the agency's compliance report.

PART II: SUMMARY OF FINDINGS

§602.16 Accreditation and preaccreditation standards

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if -

- (1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:**

(b) If the agency only accredits programs and does not serve as an institutional accrediting agency for any of those programs, its accreditation standards must address the areas in paragraph (a)(1) of this section in terms of the type and level of the program rather than in terms of the institution.

(c) If the agency has or seeks to include within its scope of recognition the evaluation of the quality of institutions or programs offering distance education or correspondence education, the agency's standards must effectively address the quality of an institution's distance education or correspondence education in the areas identified in paragraph (a)(1) of this section. The agency is not required to have separate standards, procedures, or policies for the evaluation of distance education or correspondence education;

Previous Issue or Problem: During its December 2010 review of the agency, Department staff noted that MACTE required programs that were providing some distance education to achieve the same outcomes, and to be evaluated, based on the same standards and competencies as on-site programs. Although the agency had not accredited any programs offered totally by distance education, MACTE was experienced in evaluating programs that combined both on-site and distance methodologies. Furthermore, MACTE conducted these evaluations in accordance with its distance education policy, which then consisted primarily of definitions with suggested materials for inclusion by the program in its self-study.

As a result of its experiences, MACTE was considering expanding its distance education policy (and possibly making it into a standard). In any case, it was recognized by MACTE that its distance education policy, and the relevant accompanying procedures, needed to provide more specifics regarding the agency's expectations.

A particular problem arose because the agency had provided a sample distance education team report with its petition that was deficient in descriptive commentary regarding the program's compliance with MACTE's distance

education guidelines. This was especially troubling because distance education was the major component of the total program making it all the more important for the MACTE accreditation commission to be well-informed regarding the program's effectiveness in all the areas specified by the criteria. In particular, it was asked how MACTE evaluated the effectiveness of the student services while the distance education phase of the program was operational?

It was concluded, therefore, that MACTE did not document how its evaluation teams and decision-makers could consistently evaluate the effectiveness of MACTE's standards when it came to programs with a significant distance education component. As a result, MACTE was asked to document that its standards effectively address the quality of an institution's distance education in the ten areas specified by the criteria in §602.16(a)(1).

Agency Response and Discussion: The agency reported that it has taken some steps regarding various aspects of its operations to address the identified concerns. Primarily, the agency revised its distance education policy to further specify the agency's expectations. As well, the policy now specifies in its definitions that the interaction between faculty and students is to be both regular and substantive. Furthermore, the MACTE distance education policy is included in the revised edition of the agency's handbook provided as documentation.

The narrative refers to a site visit conducted at a Montessori program, called "Montessori Live," that is conducted primarily over the internet. The site visit report consists of the school's self-study with brief comments by the team primarily regarding how they verified the existence of the documents listed in the self-study. A brief summary of comments provided by the on-site team can also be found at the end of the institution's self-study.

The team consisted of a Montessori practitioner from an unnamed institution, the Executive Director of MACTE with a background in education, and a trainee. There was no indication in the provided materials if the two team members were qualified to review distance education. As well, there was no indication that the site visitors, and the MACTE decision-makers, underwent any training provided by the agency to evaluate the school's distance education methodologies.

Department staff notes that the agency was previously cited for providing little evaluative materials from their site visit that could be used by the MACTE decision-makers. Although the agency has improved the quality of its documentation, there is still a heavy reliance on documentation checklists. The school is asked to provide numerous documents, and the site team verifies the existence of those documents. There appeared to be very little evaluation of the worth, validity, or usefulness of the documents provided. For just one example, the school was required to provide a job description for someone. The site team then simply verified if the job description was provided with no indication in the team report if the job description met all their expectations, or if the person in the job adequately demonstrated their education and experience to handle the job requirements satisfactorily.

As noted in the previous staff analysis, there was little evidence that the agency evaluated the school's compliance with the agency's standards in each of the ten areas found in the Secretary's criteria. "Student services" was mentioned as just one example. In the current case, it appears that the school was found in compliance with the agency's standards on student services by the visiting team. However, the team remarks at the end of the report also stated – "Student services -- Resources are unclear in your handbook. It would be helpful to state where your students could go for emergency medical needs and counseling." Furthermore, Department staff found the following statement in the visited school's Student Handbook – "Montessori Live does not provide student services with career or academic advising, counseling, and health care."

Other than verifying the existence of numerous documents, there appeared to be little evaluative commentary in the sample team report that could be used by the MACTE decision-makers to evaluate the quality of the distance education program in some of the areas required by the Secretary's criteria. Until these matters are adequately addressed, the agency cannot be found in compliance with the requirements of this section.

(Note to readers: Although MACTE's compliance report narrative stated that there are automatic hyperlinks provided within Exhibit 7, the Department's e-recognition system does not support all of the shortcuts. Consequently, some of the documents cited within Exhibit 7 must be opened directly from the list of documents that were uploaded into the e-recognition system by MACTE.)

Analyst Remarks to Response:

The draft staff analysis found that MACTE needed to document how its site teams and decision-makers are trained to consistently evaluate the effectiveness of an entity with a significant distance education component. As well, the agency needed to document how its on-site visitors consistently evaluate the quality of an entity's distance education with regard to the ten areas specified by the Secretary's criteria found in §602.16(a)(1), as appropriate.

Specifically, the draft staff analysis found that the sample MACTE team report consisted primarily of a checklist of the documentation viewed on-site. Other than verifying the existence of numerous documents, there appeared to be little evaluative commentary in the sample team report that could be used by the MACTE decision-makers to evaluate the program's quality. As well, it was unclear whether the visitors themselves were trained and qualified to evaluate the distance education components of the Montessori program.

In its response, MACTE noted several proposed areas where its written materials and practices are in the process of being changed with the intent to correct the identified problems. First, the agency has formed a task force to focus specifically on identifying and correcting the system weaknesses. The agency did note that the visited school had started writing its self-study using an earlier less-detailed version of the MACTE Handbook, and that this circumstance

resulted in the team producing a written report based on extensive checklists, but little commentary. The agency had recognized the limits of that older approach, leading it to produce an improved MACTE Handbook for subsequent program evaluations to follow.

Nevertheless, it has become apparent to the agency that even the newer Handbook still does not address all the noted weaknesses. Therefore, the task force has begun addressing those problems primarily by developing requirements for team reports that focus more on program quality and assurance. Specifically, the agency's Board approved a revised report format that will contain descriptions of what was verified by the team, and how it directly addresses the MACTE standards in order to consistently assure the quality of the program's distance education components. As well, the Board voted to support current practice by including specific language requiring an expert in distance education to be on the site team, as appropriate.

In response to the draft staff analysis, the agency clarified that the on-site team in question did have a team leader that was trained by one of the Board's experts in distance education. That expert is currently President-Elect of the Board of Directors of the International Society for Technology in Education (ISTE). In addition, the designated educator on the site team has an Educational Leadership doctorate with a concentration in Curriculum, Technology and Higher Education, and has participated in over 60 site visits to schools where most included at least some use of distance education. Included in those visits were the University of Phoenix's teacher education program and Michigan State University's teacher education program. The report also provided the name of the designated practitioner on the site team, who was inadvertently left off of the site visit report. Consequently, the agency's response confirmed that two of the three on-site visitors did have significant training and/or experience in distance education. As well, the report noted that appropriate requirements to participate on future MACTE distance education teams has been added to the MACTE Handbook, and that the fulfillment of those requirements is verified prior to assignment ensuring each site visitor's suitability.

Regarding training, the agency's response noted that the training for on-site visitor contains sessions focused on distance education, and that the agency requires documentation of attendance before assignment to a team is permitted. Although it is likely that MACTE decision-makers are also required to produce evidence of having received this training, the agency report did not address that requirement in its response.

Finally, the agency's response noted that the agency will provide a teacher training conference in late November 2012 to specifically examine "Quality Assurance and Distance Education." As well, the work of the task force focusing on distance education is progressing, but has not been completed. Furthermore, any significant changes will need to be disseminated among the agency's members for comment, approval and/or implementation, as appropriate, before they can be made final. In addition, it is unknown at this time what further

changes to the proposed policies may be made as a result of the additional discussions. Therefore, until these matters are settled and implemented, a finding of compliance cannot be made.

In summary, the agency needs to finish and implement its revised requirements for the consistent evaluation of an entity's distance education with regard to the ten areas specified by the Secretary's criteria found in §602.16(a)(1), as appropriate. As well, the agency needs to document how its decision-makers are trained to consistently evaluate the effectiveness of an entity with a significant distance education component.

On a matter related to agency compliance, it was apparent to Department staff that the content of extensive guidance and discussions with previous MACTE personnel regarding these matters was not conveyed to the current MACTE Executive Director. The previous Executive Director had found other employment before a successor could be named, and the agency moved its headquarters from Wisconsin to Virginia when the new Executive Director was named, thereby losing several people with institutional memory. As a result, it is clear that the disruption of the agency's operations had a profound effect on the actions that should have been finalized by this time.

Consequently, Department staff recommends that an extension for good cause be granted to the agency for a period of 6 months. That extension should allow MACTE to expeditiously finish the work necessary to demonstrate compliance with the requirements of this section.

§602.20 Enforcement of standards

(a) If the agency's review of an institution or program under any standard indicates that the institution or program is not in compliance with that standard, the agency must--

(1) Immediately initiate adverse action against the institution or program; or

(2) Require the institution or program to take appropriate action to bring itself into compliance with the agency's standards within a time period that must not exceed--

(i) Twelve months, if the program, or the longest program offered by the institution, is less than one year in length;

(ii) Eighteen months, if the program, or the longest program offered by the institution, is at least one year, but less than two years, in length; or

(iii) Two years, if the program, or the longest program offered by the institution, is at least two years in length.

Previous Issue or Problem: During its December 2010 review of the agency, Department staff noted that this section requires an agency that finds an institution or program to be noncompliant with an agency standard, to either initiate immediate adverse action, or to allow the entity a limited time to come into compliance. As well, it was found that MACTE had the required enforcement policy, and that it included the necessary timelines in conformity with the requirements of this section.

A problem was noted, however, because the documentation that the agency had provided did not indicate what it was actually documenting. That is, it was not clear whether it was documenting an immediate adverse action, or an action that occurred after the timeframe for corrective action had expired. As a result, MACTE was asked to provide additional clarity, and documentation, to demonstrate its effective application of the agency's enforcement timelines that comply with the requirements of this section.

Agency Response and Discussion: The agency provided additional documentation to show that it does require the submission of documents demonstrating compliance within the timelines specified by the Secretary's criteria. The documentation also showed that MACTE tracks the receipt of the needed documentation and issues the accreditation certificate after the requested materials are received in a timely fashion. As a result of receiving this clarifying documentation, the agency can be found in compliance with the requirements of this section.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third-party comments regarding this agency.